



INDUSTRIAL LAMINATES/NORPLEX, INC.

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REC'D

JUL 17 2003

RESP

15 July, 2003

Kori Kuehl
EPA Region 7
901 N 5th St.
Kansas City, Kansas 66101

Kori Kuehl:

Enclosed is a copy of our updated Emergency Response plan as well as our Oil and Chemical SPCC Plan. They are being sent to you at your request as a follow-up to the RCRA inspection conducted at our facility on 5-8-2003. If there are areas in the plans that you feel need further improvement or clarification, please let me know.

If you have any questions please feel free to contact me at sloven@ilnorplex.org.

A handwritten signature in black ink, appearing to read 'Scott Loven', is written over a light blue horizontal line.

Scott Loven
HS & EQ Manager



R00416867

RCRA RECORDS CENTER

Distribution List

	Copy Number
Master Copy- In HS&E Managers office	1
Maintenance office	2
Emergency Response cart	3
Iowa Emergency Response Unit, IDNR, 401 SW 7 th Street, Suite 1, Des Moines, IA 50309	4
Postville Fire Department, Postville Iowa 52162	5
Postville Police Department, Postville Iowa 52162	6
Veterans Memorial Hospital, 40 1 st street, Waukon IA 52172	7
Allamakee County Emergency Response Comity	8

***ILN*^{NORPLEX}**
EMERGENCY RESPONSE PLAN

Purpose

The Emergency Response Plan is to provide organization and administrative guidance to prevent or minimize damage to company personnel and property in the event of an emergency or disaster. For the purpose of this plan an emergency can be defined as follows:

1. An accident causing fatal or severe injuries;
2. Unexpected operational incidents which may result in fires or explosions;
3. Forces of nature such as severe windstorm, flood, lightning, or earthquake;
4. Any incident which could affect community relations such as accidental release of toxic materials into the atmosphere or local waterways;
5. Deliberate damage from malicious mischief, sabotage, bomb threat, and riots.

All employees in the facility will be familiar with the Emergency Response Plan as follows:

- I. Their individual responsibilities for reporting emergencies.
- II. The appropriate response when an emergency and/or evacuation are declared.

A review of the above responsibilities will be conducted as a part of the employee orientation and annually thereafter. All employees who have Emergency Response responsibilities will receive 24 hours of training initially and training adequate to maintain competency annually thereafter. All training and program reviews will be documented with attendance records maintained for five years.

Emergency Control Organization

When a state of emergency is declared at the Postville Plant, the Emergency Response Organization must be immediately mobilized. Contained within the Emergency Control Organization are assignments for key members of management to insure that immediate decisions are made and carried out in an effective manner.

The Emergency Response Organization is as follows:

Emergency Response Coordinator (ERC)

Scott Loven
2345 Ranch Road
Decorah, IA
563-387-0581

2nd shift
Gaylon Jennings 563-774-3975
15047 Cedar Road
Wadena, IA 52169

Person in charge (Acts as ERC in absence of ERC)

1st shift
Shawn Thurn 563-539-4626
502 S Egbert
Monona, IA 52159

3rd shift
Rod Bries 563-539-4230
15224 Falcon Ave
Monona, IA 52159

Activities of the Emergency Response Organization will be directed from a command center. The primary command center is the Maintenance Shop. The following equipment will be located here:

- At least three radios
- PPE (Each team member has their own personal respirator)
- Copy of this manual
- Copies of MSDS's
- Flashlights

I. Emergency Response Assignments

- A. The Emergency Response Coordinator is responsible for the implementation of the Emergency Response Plan in the event of a plant emergency or potential disaster. The Emergency Response Coordinator shall make decisions and initiate appropriate action needed to minimize risk and/or damage to plant personnel, property, and the environment.
- B. The Person in Charge, under the direction of the Emergency Response Coordinator, will help administer the Emergency Response Plan and in the absence of the Emergency Response Coordinator be responsible for the implementation of the Plan.
- C. The Communications Contact is responsible for all personnel matters growing from or in the course of emergency. S/He will direct all matters relative to employee scheduling, casualty reports, public relations, in-plant welfare, and telephone and radio communications.

D. Public Relations

The Plant Manager, after consultation with the Emergency Response Coordinator, will handle all news releases, including plant bulletins and interviews with the news reporters and photographers. The responsibilities include:

1. To periodically provide the various news media with positive information by telephone before newsmen pick up rumors from outside sources and approach the Company on their own initiative. News media to be contacted should include:

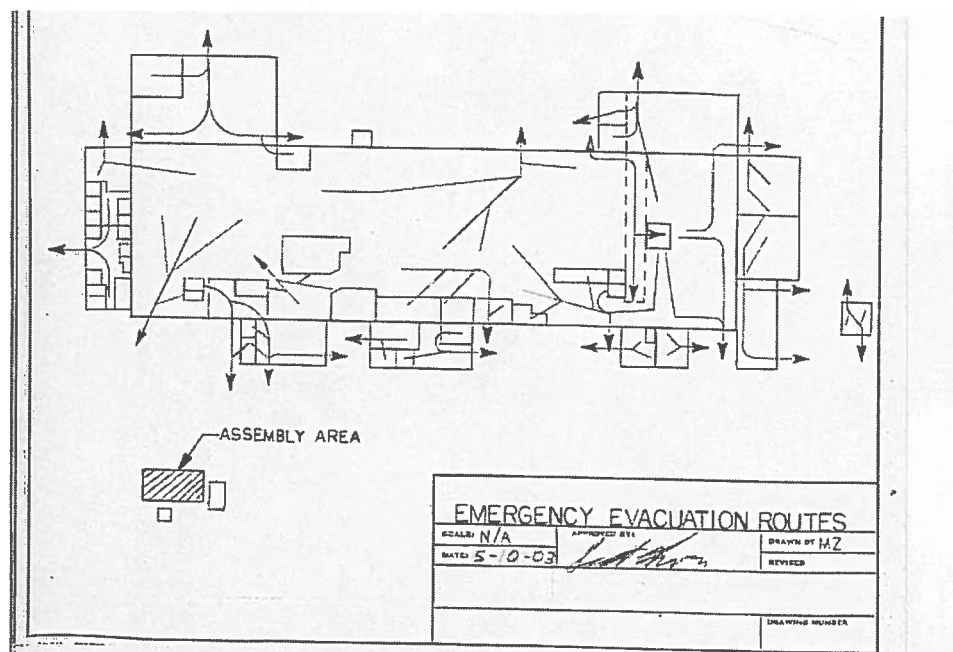
Radio - KOEL (563) 283-1234
Newspaper - Postville Herald (563) 864-7331
2. To provide meaningful, non-confidential information.
3. To set up periodic news conferences with the press to update available information. No information will be given out prior to the news conferences nor will newsmen and photographers be allowed to enter the plant.

E. Employee Welfare

Assistant Person in Charge (A.P.C) will be responsible for administering to the comfort and well being of employees, including evacuees, disaster workers and the injured. A.P.C. will arrange for preparation and delivery of food and beverages to the first-aid stations, the affected areas, and to the assembly areas.

A.P.C. will provide rescue workers with dry and comfortable clothing as needed. A.P.C. will arrange for necessary blankets, cots, etc. for injured personnel that are brought into the first-aid station or in-plant medical centers. Plant Manager will attend to the details essential to keeping up the morale of the plant personnel.

Below is the Plant evacuation drawing showing multiple exit locations from all parts of the plant.



“You are here” drawings of the above map are posted through out the facility.

Emergency Response Team	Third shift	First Shift	Second Shift
Emergency Response Coordinator	Scott Loven or person listed below	Scott Loven or person listed below	Scott Loven or person listed below
Person in charge:	Rod Bries	Shawn Thurn	Gaylon Jennings
Assistant Person in charge:	Les Tieskoetter	Dan Roffman	Bob Fosdal
Direction:	Darrin Walsh	Cheryl Thornton	Jim Russett
Headcount:	Ron Duval Donna Erickson	Lowell Houg Don Gullickson	Karen Heins Steve Smock
Response Team:	Kathy Johanningmeier	Al Monroe	Luke Wolfs
	Baron Holliday	Jerry Bissell	Melita Miller
	Dave Wille	Clinton Peterson	Daren Shaffer
	Terry McNally	Dave Palas	Marty Miller
	Al Reicks	Jim Smith	Tom Holthaus
	Tom Benson		

EMERGENCY RESPONSE TEAM:

Person In Charge: Will evaluate the severity of the situation, and direct remainder of team in the appropriate response to that emergency. Will decide what outside resources if any are needed. **Primary** consideration should be given to the safety and well being of plant personnel including the ER team. **Secondary** consideration should be given to containing or minimizing damage to plant equipment or material.

Assistant Person In Charge: Shall report to emergency taking direction from Person In Charge. Will fill in as Person In Charge in his absence.

Direction: Shall report to emergency and take direction from Person In Charge. If directed to call outside help (Fire, Ambulance Etc.), Direction Person shall place call then report to parking lot and guide outside response teams to nearest door. When outside help arrives notify Person In Charge by radio. Give radio to person in charge (Fire chief etc.) of the outside response team.

Headcount: Person shall first retrieve the radio, the list of employees, and the flashlight from the press office, and then report to area north of fire pump house. When employees report to area divide them into groups by dept. and designate a person from each dept. to take a Headcount. The Headcount person shall report by radio to the Person In Charge immediately.

All Other Employees: Report emergency over PA system (**Dial 477**). If emergency requires evacuation from all or part of the plant, say so. When evacuating, shut down equipment, then exit plant through nearest door and proceed to northwest corner of property, assemble by department and take Headcount. Wait for further instructions from Person In Charge.

July 15, 2003

CONTINGENCY PLAN

Fire/ Explosion	Spill	Name	Work	Home
If needed	If needed	Postville Fire Dept.	911	
If needed	If needed	Postville police Dept.	911	
If needed	If needed	Waukon Hospital	(563) 568-3411	
Yes	Yes* primary	Scott Loven	Ext. 227	(563) 387-0581
Yes	Yes *primary	Jim Gilbert	Ext. 222	(563) 382-2586
Alternate*	Alternate *	Tom Sattler	Ext. 232	(563) 382-4920
Yes	Yes	Dave Lensing	Ext. 209	864-7138
If needed	If needed	Dr. McMullan	864-7221	

* If spill is a reportable quantity Scott, Jim, or Tom as alternate shall call National Response Center at 800-424 8802

FIRE/EXPLOSION

Dial 477 Siren will sound, stay on phone and announce what and where emergency is. Follow the direction of the Emergency response team.

SPILL

Contact Emergency Response coordinator. Evacuate area/plant (see above) if spill poses fire, explosion, or inhalation hazard.

EMERGENCY EQUIPMENT AVAILABLE AT THE FACILITY

- Emergency response cart
 - 4 SCBA units
 - 4 Class A.B.C. Fire extinguishers
 - 2 sets protective Goggles
 - 1 safety harness
 - 1 100' nylon rope
 - 1 oxygen indicator
 - 2 emergency oxygen kits
 - 2 pair neoprene gloves
 - 2 flashlights
 - 6 air splints
 - 1 L.E.L monitor
 - 1 orange vest
 - 1 fire blanket
 - 1 first aid kit
- Fire protection
 - CO₂ system in Treater 1
 - CO₂ system in the Treater wet end area.
 - The entire building is sprinklered per code. The three mains are located in the tank farm, the 301 press room, and the lower woman's rest room
 - There are 138 fire extinguishers located throughout the Facility
 - Incipient level fire fighting hoses

- **Spill Control 4 spill control kits are located as follows: 1 in the receiving area, 1 outside of the still room, 1 in the outside barrel storage area, and 1 in the hazardous waste storage area. Spill control kit contents are as follows:**
 - 1 ea over pack drum
 - 2 ea Tyvex Suits
 - 1 ea Flash light
 - 1 ea 15/16" wrench
 - 1 ea Siphon Pump
 - 1 ea Plastic Shovel
 - 2 ea Garbage bags
 - 1 ea tarp
 - 2 ea Bung Wrenches
 - 2 ea pair Neoprene gloves
 - 3 ea 5 gal. Buckets with lids
 - 2 ea pair goggles
 - 2 ea bags Absorbent

EMERGENCIES ON WEEKENDS, HOLIDAYS, OR WHEN PLANT IS NOT IN OPERATION:

Watchmen are immediately to notify the emergency response coordinator and/or one of the Persons in charge" as listed on page 2&6 of this manual.

III. Traffic Control Inside Plant

- A. Only authorized vehicles will be allowed to enter the main gate.
- B. Employee's cars must be parked in the parking lots, without exception.
- C. Ambulances will report to first-aid unless dispatched to the emergency areas by the officer in charge of the emergency units or the plant physician.
- D. Emergency vehicles responding to our requests for help will be directed to the scene of the emergency by the safest, most direct route.
- E. Service cars, plant trucks, and engineering equipment will be routed as the situation dictates.
- F. Traffic congestion at any point cannot be tolerated.
- G. Vendors' vehicles will not be allowed to enter the plant, leave the plant, or move within the plant during a state of emergency unless specifically directed by the Emergency Response Coordinator.

IV. Traffic Control Outside Plant

- A. Access roadway to the plant must be kept open for passage of emergency vehicles.
- B. All employees reporting to work must park in the employees' parking lot.
- C. Control of traffic on public roads will not be undertaken by plant or security personnel. For traffic control on public roads, state and local law enforcement officers will be called.
- D. Request for outside traffic control aid will be made through the Emergency Response Coordinator.

V. Personnel Evacuation

All personnel not designated as part of the Emergency Response Organization or Emergency Response Team will be evacuated, if necessary, in an orderly manner as outlined in the Evacuation section of this manual. During the early phase of an emergency, a high priority should be given to accounting for all personnel.

VI. Records

The Plant Manager will be responsible for protecting essential plant records should an emergency occur. He should take whatever precautions and actions are necessary to preserve both hard copy records and data in computer storage.

VII. Emergency Shutdown of Utilities and Operating Equipment

The Maintenance Personnel will be responsible for shutdown and restoration of utilities for the general plant and any localized operating equipment that may require shutdown.

EMERGENCY RESPONSE PLAN IMPLEMENTATION

Implementing the "Emergency Response Plan" or "State of Emergency" is a decision that must be made by the:

- 1) Emergency Response Coordinator
- 2) Person in charge

When the Emergency Response Team has been summoned to the scene of an emergency, the leader may declare a state of emergency and order area or facility evacuations, equipment shut down, and utility service shut down if necessary.

When the decision to declare an Emergency Response or State of Emergency has been made, the Emergency Response Coordinator will notify all affected personal via the Emergency Response telephone system (**Dial 477**)

All area supervisors shall have the safety of their people as their prime consideration. If the evacuation signal is sounded, supervisors will evacuate their people at once. The supervisor will be sure the evacuation is orderly and that all people are accounted for. Supervisors will check the people when they reach the assembly location to see that all have been evacuated.

Evacuation

When a state of emergency exists in the plant and an evacuation is necessary, the evacuation plan will be put into effect. Upon receiving the evacuation signal, all personnel will leave the building immediately and proceed to the designated assembly area. Personnel will remain in the assembly area until released by their supervisor or given specific assignments.

When a plant evacuation is in effect, the following provisions must be taken:

1. Unauthorized personnel should not be permitted to enter the damage area.
2. All washrooms, locker rooms, offices, and out-of-the-way places should be checked to insure that all persons have been evacuated.
3. Personnel from other departments who may be in the affected areas must be evacuated along with the persons assigned to the areas.
4. Personnel from the office area who may be in the other parts of the plant at the time of an emergency should report to their departmental assembly area immediately.
5. Personnel should not be permitted to return to their work area until the Emergency Response Coordinator has declared the area safe.

6. All visitors will immediately be escorted to front desk and will be accounted for by referencing the log in book.
7. All building, machinery, equipment and rubble will be left as is and guarded, if necessary, until released by the Emergency Response Coordinator except when it obstructs rescue and fire fighting operations.
8. After the evacuation a head count must be made and an effort made to account for all people involved. The shift designated Headcount employee is responsible for verifying all employees are accounted for; the supervisor will report any missing employees to the Person in Charge. The switchboard operator is responsible for bringing the visitor log to the assembly area to assist with visitor accountability.
9. Personnel should be kept in the assembly areas until assigned specific duties, returned to their departments, or released by the supervisor in charge of the area.

Fire and Explosion

In the event of a fire or explosion, the following procedure will be followed:

- I. The person who discovers the fire shall do the following:
 1. If the fire is in an incipient stage and the employee has had fire extinguisher training the employee is to extinguish the fire using the available portable fire extinguishers. Report fire to Emergency Response coordinator.
 2. If the fire is too large to control, or the employee is not trained in the use of fire extinguishers the employee is to immediately insure that all persons in the danger area are warned. The employee is to then activate **the Emergency response System (Dial 477)** and then report to the **Emergency Response Team (ERT)** assembly point to brief the ERT on the location and size of the fire. The employee shall then evacuate the facility to their designated assembly area.
- II. The ERT will respond to the affected area and bring emergency equipment that may be needed. At the direction of the ERT Leader utilities may need to be deactivated or isolated. If the emergency is such that the plant ERT cannot control the fire, the ERT Leader will call the fire department and activate the Emergency Control Plan. This may include evacuation of the plant per the evacuation plan on page 7.
- III. In the event a fire department response is required a member of the ERT will meet the fire department in the driveway or road approaching the plant and direct them to the area of the emergency.
- IV. If a fire occurs in the treater the ERT should secure the treater (ventilation, web travel, etc.) and manually discharge the CO₂ extinguishing system (if it has not yet discharged). The ERT member should assure that all doors are closed and evacuate the area.
- V. In the event the sprinkler system is activated due to a fire the riser valve must not be turned off until the ERT leader or fire department has determined the fire is extinguished.
- VI. If the emergency coordinator determines that the facility has had a release or explosion which could threaten human health, or the environment, outside the facility, he must report his findings as follows: Notify Postville police and Fire departments via 911 and if appropriate, the National Response Center at 800-428-8802. BE prepared to give the following information:
 - Name and facility address
 - Time & type of incident (eg fire, release)

- Name and quantity of materials involved to the extent known
- The extent of injuries
- Possible hazards to human health, or environment, outside the facility

RCRA Hazardous Waste Contingency Plan

1. The purpose of this plan is to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. The contingency plan should be invoked whenever a hazardous waste emergency could threaten human health or the environment.
2. The Hazardous Waste Contingency plan will follow the Emergency Response plan as detailed in other parts of this procedure.
3. The Postville Fire and Police departments have agreed to support ILNorplex in responding to any disaster that may threaten our facility including fire and explosion. Veterans Memorial Hospital has an emergency response committee that is familiar with our facility and the kind of injuries that we might present to them in an emergency.
4. Names, addresses, and phone numbers for all persons qualified to act as emergency response coordinator are listed on page 2 of this manual.
5. This procedure is distributed per the list located on page 1 this procedure.
6. This procedure shall be reviewed and amended if necessary per 49CFR265.54
7. Those qualified to act as Emergency Response Coordinator are as listed on page 2 in this procedure.
8. Emergency procedures:
9. Follow the same procedure for hazardous/flammable liquids emergencies detailed elsewhere in this manual with the following additions:
10. Immediately after an emergency, the emergency coordinator must provide for storing, or disposing of recovered waste, contaminated soil or surface water, or any material that results from a release, fire, or explosion at the facility.
11. Incompatible wastes/materials must be kept separate during cleanup and disposal. All emergency equipment used for the clean up must be rendered fit for use or replaced before operations in that area may resume.
12. Following an emergency involving hazardous waste that requires the implementation of the contingency plan, the emergency response coordinator shall notify the appropriate authorities per 40cfr.265.56(d)

Spill Response

In order to ensure timely and effective response to hazardous material spills, all plant personnel must have an awareness of, and involvement in, spill response situations.

Most plant personnel will only be involved in recognizing a spill and reporting it immediately to the lead member of the Emergency Response Team. To that extent, it is not appropriate for any plant personnel to be involved beyond this level unless they are a member of the Emergency Response Team and have been properly trained in emergency response situations.

Refer to the SPCC, Oil and Chemical Spill Plans for further details regarding spill response.

Oil and Chemical SPCC Plan
ILNorplex, Inc.
Postville, Iowa

1.0 Introduction

1.1 ILNorplex Environmental Control Policy

ILNorplex is committed to the protection of the environment and has integrated this concern at the operational level into the training and work practices of each employee in order to exert maximum effort to prevent the occurrence of any oil or hazardous chemical spill and to ensure compliance with applicable regulations. To accomplish this objective, this facility has developed an Oil and Chemical Spill Control and Countermeasure (SPCC). This plan identifies facility drainage, bulk storage tank inventory, facility transfer operations, facility tank car loading and unloading controls, documentation for inspections and maintenance of records, security, personnel training and spill prevention. This SPCC Plan describes the operational procedures implemented by the Postville Plant to control oil and/or hazardous chemical spills.

This plan is designed to serve as the management tool to identify the policies and procedures required to effectively control, manage, mitigate and ultimately prevent spills at the facility.

1.2 Regulatory Criteria

Requirements pertaining to accidental or intentional discharges of oil and hazardous substances that were consulted in the development of this Plan include the EPA regulation on Oil Pollution Prevention at 40 CFR 112. This regulation outlines the requirements for agency notification and record keeping in the event of an oil or hazardous chemical spill.

1.3 Postville SPCC Management and Organization

The Postville plant management is committed to the implementation and maintenance of this SPCC Plan. Plant spill response operating procedures require immediate containment, a determination of notification requirements, an assessment of hazards and an evaluation of clean-up actions necessary to abate the spill.

Responsible parties for spill control at the facility include Jim Gilbert, Plant Manager, and Scott Loven, HS&EQ Manager. The designated Emergency Response Coordinators for the facility are as listed in the Emergency response manual.

The SPCC Plan shall be amended as required to reflect any significant modifications to the facility. Modifications to the Plan shall be required when:

- Applicable regulations are revised;
- The SPCC fails in the event of an emergency;
- Significant design changes effecting the potential hazards occur; and
- The list of emergency equipment or Emergency Response Coordinators changes.

Major amendments are to be recertified by a professional engineer. This Plan shall undergo a mandatory review every three years from the original date of issue as required in 40 CFR 112.5. Copies of the plan shall be maintained at the facility at all times.

1.4 Spill Reporting

ILNorplex Postville Plant policy for emergency response specifies that it is the responsibility of the HS&EQ Manager to report immediately any spill of a hazardous substance equal to or in excess of the "reportable quantity" threshold, other than a Federally Permitted release, to the National Response Center at (800) 424-8802. In addition, local reporting of any substantial risk information is to be made to:

National Response Center (NRC)

(800) 424-8802

State Environmental Regulatory Agency

Iowa Department of Natural Resources
Wallace State Office Building
Des Moines, Iowa 50319
(515) 281-5145

Iowa Department of Natural Resources
817 West Fayette St.
Manchester, Iowa 52057
(319) 927-2640

State Emergency Response Commission

Iowa Emergency Response Unit
IDNR
401 SW 7th St., Suite 1
Des Moines, IA 50309
(515) 281-6175

Catastrophic Spill Contact

Enviromark
7301 Vine Street Court
Davenport, Iowa 52806
(563)-388-9100

Local Emergency Planning Committee

(563) 586-2996

1.5 Spill History

There have been no oil or hazardous chemical spills at the Postville facility in the past 12 months.

2.0 Facility Description

2.1 Site Description and Facilities

The facility is located on 20 acres in Postville, IA. The site topography is relatively flat with surface drainage primarily towards the southeast.

The site consists of a main building, which includes the manufacturing area, the bulk storage tank farm, the maintenance shop, and a quality control laboratory and office area. Also located on site is a building used for drummed raw material and waste storage. Cooling water used on site drains to a 120,000-ft³ pond which discharges to Robert's Creek under the provisions of an NPDES permit.

A layout of the facility is shown in Figure 1.

Adjacent property includes a private farm and feed mill to the south.

2.2 Process Description

The ILNorplex, Postville, IA facility manufactures industrial laminate boards. Various petroleum based liquids and other chemicals are used directly in, and in support of, the manufacturing process. Natural gas is used to fire curing ovens, hydraulic oil is used to operate presses and liquid solvents and solvent based resins are the raw materials used in the laminate manufacturing process.

3.0 Facility Drainage

Site surface drainage is generally toward the southeast. Drainage points include the NPDES permitted outfall from the cooling water pond and 4 culverts used to carry storm water from the northeast side of the property to Robert's Creek. Discharge of storm water from the culverts is approved via a General Storm water Permit. The discharge locations and general site drainage patterns are presented in Drawing 2365-L.

3.1 Storm water Management

As mentioned above, a General Storm water Discharge Permit covers storm water discharge from the site. The provisions of that permit require that a Storm water Pollution Prevention Plan (PPP) be developed to help prevent the discharge of contaminated water. The provisions of the Storm water PPP are incorporated into this plan by reference.

3.2 Storage Area Drainage

With the exception of the hydraulic oil tank all chemical storage and loading and unloading areas are located inside buildings. The hydraulic oil tank is located outside in a diked area. The tank has a capacity of 2,000 gallons and the dike has a containment capacity of 6,390 gallons. The containment dike is equipped with a drain valve that is maintained in the closed position except when it is necessary to open it to remove accumulated rainwater. However, prior to opening the valve the accumulated water is visually checked for the presence of oil. If oil is noted it will be picked up with absorbent materials prior to discharge. If no oil is noted the drain valve is opened and the material is discharged to the ground outside the dike. Records of the drainage are maintained. A copy of the inspection sheet can be found in Attachment 3.

4.0 Chemical Storage

4.1 Tank Management

The Postville plant uses both indoor and outdoor bulk storage tanks for holding raw materials and process chemicals. All tanks are located within secondary containment, which is designed to hold the entire contents of the tank plus 10 percent. All tanks are made of carbon steel, which has been determined to be appropriate for the materials stored in the tanks. A listing of the tanks, the materials stored, the location and the capacity is presented in Attachment 4. Drawing 2365-L indicates the locations of these tanks at the facility.

All storage tanks are equipped with an automatic high level shut off. These devices will help prevent a spill from occurring due to tank overfilling.

The management of tanks includes weekly visual inspections to check for tank integrity. These inspections are noted on a log. A copy of the inspection log is presented in Attachment 5.

The facility has eight underground storage tanks. These tanks have been closed in place. The facility has an active groundwater-monitoring program to ensure that contamination, caused by these tanks when in service, does not migrate off-site.

4.2 Drum Management

The Postville facility uses 55-gallon drums for the storage of raw materials and wastes. Raw materials are stored in the flammable storage building at the southeast side of the property. Drums containing wastes are stored in the 90-day storage area adjacent to the flammable storage building.

Both the flammable storage building and the 90-day storage area are fully enclosed. There are no drains or sumps in either of these buildings.

Empty drums are stored on their sides with the bungs in them at the southwest side of the manufacturing building. Management of these drums is more fully described in the Storm water PPP.

4.3 Miscellaneous Chemical Storage

Chemicals used to support plant operations are stored in various locations at the plant site. These locations include: the quality control laboratory, the warehouse and the maintenance shop. Chemical storage in these areas of the plant is in drum or smaller quantities.

5.0 Transfer Operations

The Postville facility has a documented procedure for the transfer of materials from trucks to the designated storage tank. This procedure is provided in Attachment 6. This procedure details the requirements for inspections, personnel assignments, safety requirements and oversight by ILNorplex employees.

6.0 Unloading Facilities

There are two unloading facilities for bulk chemicals and one unloading area for drummed materials at the Postville facility. The locations of these areas are detailed on Drawing 2365-L .

6.1 Solvent/Resin Unloading Area

The unloading area for bulk solvents and resins is located within the main manufacturing building. The area is constructed of concrete and completely enclosed, therefore, preventing the accumulation of rainwater in the containment area. The containment area is designed to hold the entire contents of a tank truck. The area is inspected as part of the unloading procedure.

6.2 Hydraulic Oil Unloading Area

The unloading area for hydraulic oil is located on the northwest side of the main manufacturing building. The area has a concrete berm where tank trucks back into during

unloading. The berm is designed to contain the entire contents of the tank truck. The area is inspected as part of the unloading procedure. The area is also inspected after each rainfall to determine if accumulated water can be discharged.

6.3 Drummed Material Unloading Area

Drummed materials are received at the loading dock. The drums are lifted from the truck and placed in the warehouse. Once inside the warehouse, the drums are checked by Quality Assurance. Upon acceptance by Quality Assurance the drums are then transferred via forklift to the flammable storage building.

The receiving dock is made of concrete. There is an awning above the door opening to keep rain out of the building when trucks are being unloaded. There are no drains by the dock, and the area where the truck is parked is relatively flat. The wheels of the truck are checked before the truck is unloaded.

7.0 Inspections and Records

The Postville facility maintains an inspection and records program designed to monitor, correct and document any actions taken by plant personnel related to storage of plant materials, maintenance of transfer piping, documentation of transfer operations and storm water drainage logs. The following is a list of the inspection and reporting forms used to document plant activities:

- Storm water Drainage Inspection: Details the procedures to use to inspect accumulated storm water in containment dikes prior to discharge. It also outlines the procedures to follow should contamination be found in the accumulated water. (Attachment 3)
- Aboveground Tank and Piping Inspection: This procedure is used to inspect aboveground piping and tankage for leaks and deterioration. This inspection is conducted by maintenance on a monthly basis (Attachment 7). In addition to the above inspection, non-destructive tank testing is conducted on a 10-year basis.
- Material Transfer SOPs: This inspection and unloading procedure documents the requirements for ensuring that there is adequate volume in the storage tank for the material being received, that proper safety procedures are being followed, procedures for disconnecting the truck at the end of the transfer operation and the procedures for reporting spills and leaks if they were to occur (Attachment 6).

8.0 Spill Response Procedures

8.1 General Duties and Emergency Procedures for the Emergency Response Coordinator

Whenever there is an imminent or actual emergency situation, the Emergency Response Coordinator (or his designee when the Emergency Response Coordinator is on call) must immediately:

- Activate internal facility alarms and communications systems to notify all facility personnel; and
- Notify appropriate Federal, State or local agencies with designated response roles if their help is needed.

Whenever there is a release, fire or explosion, the Emergency Response Coordinator must immediately identify the character, exact source, amount and actual extent of any released materials. He may do this by observation or review of facility records or if necessary by chemical analysis.

Concurrently, the Emergency Response Coordinator must assess possible hazards to human health or the environment that may result from the release, fire or explosion. This assessment must consider both direct and indirect effects of the release, fire or explosion (e.g., the effects of any toxic, irritating or asphyxiating gases that are generated, or the effects of any contaminated surface water run-off from water or chemical agents used to control fire and heat-induced explosions).

The Postville facility has established a contact for 24-hour emergency spill cleanup response with Enviromark in Davenport, Iowa. See **1.4 Spill Reporting** above for additional information.

If the Emergency Response Coordinator determines that the facility has had a release, fire or explosion that could threaten human health or the environment, outside the facility, he must report his findings as follows:

- If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriate local authorities. He must be available to help appropriate officials decide whether local areas should be evacuated; and
- He must immediately notify the National Response Center at (800) 424-8802. This report must include:
 - Name and telephone number of reporter;
 - Name and address of facility;
 - Time and type of incident;
 - Name and quantity of material(s) involved, to the extent known;
 - The extent of injuries, if any; and

- The possible hazards to human health or the environment, outside of the facility.

During an emergency, the Emergency Response Coordinator must take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur or spread to other hazardous materials at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing the materials and removing or isolating materials.

If the facility stops operations in response to a fire, explosion or release, the Emergency Response Coordinator must monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment, wherever appropriate.

Immediately after an emergency, the Emergency Response Coordinator must provide for treating, storing or disposing of the recovered materials and wastes, contaminated soil or surface water or any other material that results from a release, fire or explosion at the facility.

The Emergency Response Coordinator must ensure that in affected area(s) of the facility:

- No waste that may be incompatible with the released material is treated, stored or disposed of until cleanup procedures are completed; and
- All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

8.2 General Spill Response Procedures

8.2.1 Containment

Containment is the first order of control.

For tank farm dikes all drain valves shall remain closed and shall not be opened without the permission of the area supervisor or his designee.

8.2.2 Notification

Upon discovery of a spill or leak and after initial containment, the following actions shall be taken, as applicable:

Personnel	Notification Requirements	Documentation and /or Action
First On Scene	Emergency Response Coordinator	Spill Report

	Plant Manager	
Plant Manager	Emergency Response Team	Control and reporting of spill
Emergency Response Coordinator	HS&E Manager	Control, Report and supervise clean-up
HS&E Manager (if CERCLA reportable spill)	<ul style="list-style-type: none"> - National Response Center - State Emergency Response Commission (SERC) - Local Emergency Planning Commission (LEPC) 	Spill Report

8.2.3 Sampling & Monitoring

The spilled material will be identified either through existing material safety data sheets or through analysis of a sample. Environmental media sampling of soil or surface water will be conducted as directed by the HS&E Manager. The HS&E Manager will determine if the spilled material is a hazardous waste.

The HS&E Manager will also be responsible for determining employee exposure, monitoring and sampling and employee safety.

8.2.4 Recovery

The HS&E Manager will coordinate on the spill clean up and disposal method.

After containment, notification and identification, the spilled material will be recovered either by: 1) pumping the material to a storage vessel; 2) transferring the material to a mobile holding tank; or 3) transferring the material into drums.

Residual liquid contamination will be recovered using appropriate sorbent material. Sorbent material will be placed in a waste storage drum, labeled and stored in the 90-day accumulation area.

8.2.5 Reports, Record keeping and Inspections

All records regarding the spill will be maintained in the HS&E Manager's office. These records will include, but are not limited to: Agency notification logs, Agency follow-up reports, employee exposure records and internal spill reports.

8.3 Material-Specific Response Techniques

General spill response techniques have been developed for the raw materials and support materials used at the Postville Plant. These include:

- Flammable liquids and gases
- Flammable solvents or fuel
- Acids and acid solutions

The guidance sheets may be distributed or posted as appropriate. Copies of the guidance sheets are located in Attachment 8. Drawing 2365-L identifies the on-site locations of spill response materials.

9.0 Security

The Postville facility is totally enclosed by a fence. Entrance gates to the facility are locked and a guard is on duty when the plant is not in production or is unattended. The facility also has adequate lighting to detect spills and to deter vandalism.

Visitors, contractors and other personnel are required to abide by the facility emergency evacuation procedures. The facility is equipped with an emergency evacuation alarm. If the alarm is sounded, all personnel on-site are required to assemble in the Assembly Area for further instructions. At that time a head count is performed to ensure that all personnel have exited the site.

10.0 Training Programs

The Postville facility maintains and implements a personnel training program designed to ensure that plant operating practices and procedures will prevent chemical and/or oil spills, releases or accidents from occurring. This section of the Plan identifies the standard training programs employed at the facility that are required for all. These training programs, in conjunction with the Plant's Standard Operating Procedures, provide the mechanisms to reduce the risk to employees and/or plant property in the event of a release of hazardous chemicals.

The nature of the organic products handled at the facility require good operation control. Each supervisor is responsible to see that good operating practices maintain high standards, provide for the safety of employees and protect the environment. To achieve these objectives each employee is required to be trained and reviewed in each of the following areas:

- Hazardous Materials Communication;
- Respiratory Protection Programs;
- Operations logs and documentation;

-Safety procedures including confined space entry, electrical lockout and use and maintenance of fire extinguishers;

- Safety equipment and personal protection procedures;

- RCRA hazardous waste training;

- Storm water Pollution Prevention Plan.

In addition to the general training noted above, spill prevention briefings are held annually for all personnel involved with storage tanks and associated piping.

11.0 CONTAINER MANAGEMENT

11.1 Introduction

Spills are a common problem throughout industry resulting in potential employee exposures to hazardous materials and environmental contamination. A comprehensive container management program and thorough training will help ILNorplex avoid the problems and costs associated with leaks and spills from containers.

Container management practices specific to hazardous waste are covered under the Hazardous Waste Management Training.

11.2 Types of Containers

A. Drums

- a. Most of the hazardous chemicals in use at the plant are received in 55-gallon drums. These drums can be made of steel, fiberboard, or plastic.
- b. Steel drums are mostly used to contain flammable liquids such as solvents or liquid resins. The drums can be either open top where the entire top is removable, or closed top where two small holes or bungs are sealed with threaded caps.
- c. Fiberboard drums are used to contain some powdered or granulated materials and in some cases, liquids. These drums are almost always of the open top type.

B. Carboys and Pails

- a. Carboys and pails are smaller containers used mostly to contain maintenance and janitorial chemicals

C. Bags

- a. Bags Paper and plastic are used in the plants to contain dry chemicals such as Dicy, and antimony trioxide.

11.3 Labeling

All containers at the plant must be labeled according to applicable regulations.

A. Hazardous Materials containers must be labeled with information that identifies the container contents in a manner that all functionally literate personnel can understand.

B. Hazardous waste containers must be labeled with the words "Hazardous Waste", a description of the waste, and a hazard class label such as Flammable Liquid or Corrosive Liquid diamond labels.

All containers, regardless of size or use, must have the appropriate labels.

11.4 Container Receiving and Offloading

When a delivery of containers arrives at the receiving dock, the receiving personnel must inspect every container for signs of leaks, spills or other damage.

If any of these conditions exist, the container must be set aside and the condition corrected prior to placing the container in storage, or the container must be rejected.

We may assist the transporter, if needed, in plugging a leaking container that has been rejected to avoid contamination of the environment during its return shipment.

Under no circumstances should a leaking container or a damaged container with an eminent potential for leaking be placed in storage at the plant without being corrected first.

11.5 Container Transfer

A. The following steps and practices should be followed anytime a container is being transferred anywhere in the plant or on the plant grounds.

1. Check and tighten all bung caps or container lids to ensure a tight seal on all container openings.

2. Drum transfer should be done only with an approved drum cart, dolly, on a pallet with a forklift, or with a forklift equipped with a drum grabber. Drums should not be transferred by placing on the bare forks of the lift,
3. All other containers should be transferred in a manner that minimizes the potential for a container tipping.
4. Transfer of hazardous material containers from one area to another should only be via safe designated routes. For example, flammable liquids should not be transported through areas where burning or welding is taking place.

11.6 Storage

A. Storage Area Requirements

1. All hazardous materials and hazardous waste must be stored in an area equipped with impervious secondary containment and a roof or other means of preventing precipitation from contacting the containers.
2. All storage areas should be clearly marked with signs indicating the types of materials stored and all applicable precautions (i.e. "Flammable Liquids" and "No Smoking",

Trainer will identify each specific hazardous material storage area in the plant and the materials stored there including all hazardous waste storage areas.

3. Incompatible materials should be stored in separate areas or should be separated by dikes or berms if stored in the same area. This will prevent dangerous reactions between incompatible materials such as organics and oxidizers (oxidizers can cause organics to burn) in the event of a spill.

B. Container Placement in Storage Area

1. Containers should be positioned in a way that the labels can be easily read.
2. There should be adequate aisle space between rows of containers or rows of pallets holding containers, to allow for easy inspections of containers for damage, leaks, or labeling inadequacies.
3. Containers may not be stacked unless a pallet is placed between them and in any case containers should not be stacked more than 2 high.

4. Drums of flammable liquids should not be placed in a storage area exposed to heat or direct sunlight. Drums of water-based liquids should be protected from freezing.

C. Emergency Response Equipment

A fully equipped spill response kit must be kept in near proximity to each storage area. A fire extinguisher must be kept outside, but in near proximity to flammable liquid storage areas.

D. Storage Area Inspections

1. Hazardous Waste Storage Areas

Federal regulations require weekly inspection of all of these storage areas. This is covered in detail as part of the Hazardous Waste Management training.

11.7 Dispensing From Containers

- A. All containers of flammable liquid must be grounded prior to dispensing or adding material to the drums.
- B. Care must be taken during all dispensing to minimize the potential for spills.
- C. All spills, no matter how minor, must be cleaned up immediately.
- D. Particular care should be taken during the dispensing of powdered or granulated materials to minimize dust generation.

11.8 Empty Containers

- A. All containers must be completely drained or emptied of their contents prior to being placed in the empty container storage area.
- B. Bungs or tops on empty containers must be tightly sealed.
- C. Empty drums should have some indication of what the previous contents were.
- D. All empty containers should be stored in a common location that is protected from precipitation. Empty containers should not be allowed to be strewn across the plant property.

11.9 Shipping

A. All containers must be inspected prior to shipment for:

1. Proper labeling as required by DOT (see Hazardous Material Transportation Training).
2. Containers are in good condition.
 - a. No severe dents, rusting, bulges, spill or drip marks.
 - b. Tops or bung caps are all tightly secured.

B. ILNorplex personnel should verify that containers are properly secured on the truck before it leaves the plant.

11.10 Spill Response

A. Detailed spill response information is covered in the Spill Response Training Guide.

B. In general, the following actions can be taken to stop a container leak:

1. Roll a leaking drum so that the hole is above the liquid level line.
2. Transfer contents of leaking container to a sound container.
3. Patch holes in container.
4. Overpack the leaking container by placing it in a larger, sound container.

C. Be sure to wear all appropriate PPE when handling a leaking container (see Haz Comm. and PPE Training).

D. Be sure to make proper notifications in the event of a leaking container (see Spill Response Training).

ATTACHMENT 6

Tank Truck Unloading Procedure

- _____ 1. Shutdown vehicle motor.
- _____ 2. Ground truck.
- _____ 3. Chock trailer.
- _____ 4. Don all required protective equipment. Ensure that a freestanding extinguisher with at least 60 BC rating is within 20 feet of operator while unloading is in progress.
- _____ 4. Check volume in storage tank to make sure tank will hold material to be unloaded.
- _____ 5. Hook up hose from truck to unloading line, wire down all hose locks.
- _____ 6. Open valves to unloading line to storage. Check for leaks; if leaks are found they must be repaired before material is unloaded.
- _____ 7. When unloading is complete, ensure that all transfer lines have been disconnected prior to having the truck leave.

Receiving: _____

Date: _____

ATTACHMENT 5

Bulk Storage Tank Inspection Form

Tank	General Condition	Supply Piping & Valves	Tank Supports	Foundations	Comments
101					
102					
103					
104					
105					
106					
107					
108					
109					
110					
122A					
309					
952					

Date: _____

Inspector: _____

ATTACHMENT 4

STORAGE TANK LISTING

Tank Identification	Contents	Installation Date	Capacity (Gallons)	Location
309	Hydraulic Oil	1991	2000	Outdoors on East Side of Manufacturing Building
952	Waste Oil	1983	1500	Maintenance Shop
101	Phenolic Resin	1991	7500	Indoor Tank Farm
102	Phenolic Resin	1991	9000	Indoor Tank Farm
103	Phenolic Resin	1991	9000	Indoor Tank Farm
104	Saniticizer 160	1991	7500	Indoor Tank Farm
105	Ethanol	1991	5000	Indoor Tank Farm
106	Toluene	1991	4500	Indoor Tank Farm
107	Acetone	1991	7500	Indoor Tank Farm
108	Dimethyl Formamide (DMF)	1991	7500	Indoor Tank Farm
109	Propylene Glycol Monomethyl Ether (PM)	1991	7500	Indoor Tank Farm
110	Isopropyl Alcohol (IPA)	1991	1500	Indoor Tank Farm
122A	Epoxy Resin			Batch Still Room